

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**GINA LEE TALLEY**

**CHAPTER 13**

**DEBTOR**

**CASE NO. 18-11359 JDW**

**MOTION FOR MODIFICATION OF AUTOMATIC  
STAY TO ALLOW LOAN MODIFICATION AGREEMENT**

**COMES NOW**, Gina Lee Talley, by and through her attorney, and moves the Court for entry of an Order Allowing a Permanent Loan Modification Agreement with Fay Servicing. A copy of the Trial Loan Modification Agreement is attached hereto as **“Exhibit A”**. Upon entry of the order pursuant to this Motion and execution of the Loan Modification Agreement, the Agreement shall become binding upon all parties thereto, the proposed order is attached hereto.

WHEREFORE, Debtor prays that the order be entered modifying the automatic stay to allow a Permanent Loan Modification Agreement upon submission of the order to the Court.

Respectfully submitted, this the 7<sup>th</sup> day of June, 2021.

/s/ Robert H. Lomenick  
KAREN B. SCHNELLER, MSB 6558  
ROBERT H. LOMENICK, JR., MSB 104186  
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**CERTIFICATE OF SERVICE**

I, Robert H. Lomenick, attorney for the Debtor, hereby certify that a copy of the foregoing Motion for Modification of Automatic Stay to Allow Permanent Loan Renewal Agreement has this day been served upon the following, either by electronic means or by United States Mail.

**Fay Servicing, LLC  
Attn: Bankruptcy Department  
P.O. Box 814609  
Dallas, TX 75381-4609**

**Caliber Home Loans  
Attn: Loss Mitigation Modification  
12801 Wireless Way  
Oklahoma City, OK 73134**

**Caliber Home Loans  
PO Box 24610  
Oklahoma City, OK 73124-0610**

**Laura Henderson-Courtney, Via ECF  
on behalf of U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust  
[laura@kmcphail.law](mailto:laura@kmcphail.law), [lhend@aol.com](mailto:lhend@aol.com)**

**J. Gary Massey, Via ECF  
on behalf of U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust  
[msbankruptcy@logs.com](mailto:msbankruptcy@logs.com)**

**Locke Barkley  
Chapter 13 Trustee  
6360 I-55 North, Suite 140  
Jackson, Mississippi 39211**

**Office of U.S. Trustee  
501 East Court Street, Suite 6-430  
Jackson, Mississippi 39201**

This the 7<sup>th</sup> day of June, 2021

/s/Robert H. Lomenick  
**ROBERT H. LOMENICK**